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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
Carlos J Bautista-Escobar : CASE NO. 22-20064
Debtor : HONORABLE JOHN K. SHERWOOD

ATTORNEY'S RESPONSE TO CREDITOR'S CERTIFICATION OF DEFAULT

I, Russell L. Low, hereby certify the following:

1. I represent the debtor, Carlos J. Bautista-Escobar, in his Chapter 13 bankruptcy.
2. The debtor made an additional mortgage payment that is not listed on the post-petition payment history attached to the Creditor's Certification of Default.
3. Therefore, the debtor is respectfully requesting that the mortgage company provide an updated post-petition payment history that reflects this payment which should show that the debtor is current on the mortgage payments through July 2025.
4. The debtor will make August's mortgage payment in a timely manner.
5. Therefore, I am respectfully requesting on behalf of the debtor that a hearing be scheduled for the Creditor's Certification of Default so that the debtor may have the opportunity to resolve this matter.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: August 4, 2025

/s/ Russell L. Low
Russell L. Low
Attorney for Debtor